IN THE UNTED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

JOHN SOLAK, Individually and On Behalf of All Others Similarly Situated,

Plaintiffs,

v.

JOSEPH E. CONSOLINO, et al., and

NATIONAL INTERSTATE CORP.,

Defendants.

Case No. 5:16-cv-02470

JUDGE SARA LIOI

MOTION FOR ADMISSION PRO HAC VICE OF GREGORY M. NESPOLE

MOTION FOR ADMISSION PRO HAC VICE OF GREGORY M. NESPOLE

Pursuant to Local Rule 83.5(h), Plaintiffs ("Plaintiffs"), respectfully move this Court for an Order granting Gregory M. Nespole of Wolf Haldenstein Adler Freeman & Herz LLP to appear *pro hac vice* on behalf of the Plaintiffs in the trial of this action and for all proceedings related thereto. In support of this motion, Plaintiffs aver:

- 1. Daniel R. Karon is an attorney duly admitted to the Bar of the State of Ohio, authorized to practice before this Court and co-counsel for Plaintiffs.
- 2. Gregory M. Nespole is a partner of the law firm Wolf Haldenstein Adler Freeman & Herz LLP.
- 3. Gregory M. Nespole is a member in good standing of the bar of the State of New York (Bar No. 2594356). He is also admitted in the United States District Court for the Southern

and Eastern Districts of New York, and the United States Court of Appeals for the Second,

Fourth, and Fifth Circuits.

4. There are no disciplinary proceedings pending against Gregory M. Nespole in

any jurisdiction and he has never been the subject of any disciplinary proceeding in any

jurisdiction.

5. Plaintiffs desire Gregory M. Nespole to actively participate as co-counsel on

their behalf along with counsel of record Daniel R. Karon from Karon LLC for the conduct of

trial and all pretrial and post-trial proceedings in this matter.

6. Gregory M. Nespole understands that admission *pro hac vice* before this Court

subjects him to the disciplinary jurisdiction of this Court. The Affidavit of Gregory M. Nespole

is attached hereto as Exhibit A in support of this Motion.

WHEREFORE, Plaintiffs respectfully request that this Court grant this Motion for

Admission Pro Hac Vice of Gregory M. Nespole.

The pro hac vice admission fee is tendered to this Court in accordance with Local Rule

83.5(h).

Dated: October 24^{m} , 2016

Respectfully submitted,

/s/ Daniel R. Karon

Daniel R. Karon (#0069394)

Karon LLC

700 West St. Clair Avenue

Suite 200

Cleveland, OH 44113

Phone: 216.622.1851

Fax: 216.241.8175

Email: dkaron@karonllc.com

Attorney for Plaintiffs

2

Case: 5:16-cv-02470-SL Doc #: 21 Filed: 10/24/16 3 of 3. PageID #: 388

CERTIFICATE OF SERVICE

I hereby certify that on October 24th, 2016, a copy of the foregoing was filed electronically with the Clerk of the Court in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to all registered counsel by operation of the Court's Electronic Filing System. Parties may access this filing through the CM/ECF system.

<u>Isl Daniel R. Karon</u> Daniel R. Karon